



South Coast
Air Quality Management District

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FAXED:AUGUST 31, 2007

August 31, 2007

Ms. Heather Allen, Acting Senior Planner
City of Fullerton, Community Development Department
303 West Commonwealth Avenue
Fullerton, CA 92832

**Draft Environmental Impact Report (Draft EIR) for the Proposed Jefferson
Commons Specific Plan**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC070731-06
Control Number

Localized Significance Thresholds

1. Because the proposed site is located less than a quarter-mile from existing university housing and multi-family residences to the north; high-density residences located northwest and east; and single-family residences are located south of the proposed site, a localized air quality analysis may be warranted to ensure that the students and residents living near the proposed site are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

Construction Mitigation Measures

2. The lead agency has determined that construction air quality impacts will exceed the SCAQMD's daily significance threshold for oxides of nitrogen (NO_x), PM₁₀, and PM_{2.5}. Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html . The SCAQMD recommends that the lead agency also consider adding the following mitigation measures to further reduce NO_x impacts from the project, if applicable and feasible:

Recommended Additional Mitigation Measures:

- Prohibit truck idling in excess of five minutes;
 - Use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.;
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
 - Reroute construction trucks away from congested streets or sensitive receptor areas; and
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
3. In subsection 3.2.2 in Appendix C, a number of measures are identified that would reduce operational emissions. It is unclear from the discussion whether or not these measures are intended as mitigation measures for the project's operational air quality impacts, especially given the fact that they are not discussed in subsection 3.4.6 of the Draft EIR. It is recommended that the lead agency specifically identify those mitigation measures in subsection 3.2.2 of Appendix C that are to be included as mitigation measures for the proposed project and incorporate those measures into subsection 3.4.6 in the Final EIR.

4. In subsection 3.4.7, under the heading “Long-Term Impacts”, the lead agency concludes that operational air quality impacts do not exceed the SCAQMD recommended thresholds of significance. Given that no mitigation measures are identified in the Draft EIR to reduce operational emissions, this conclusion is inconsistent with the project emissions in Table 3.4-8, which shows VOC and NOx emissions exceeding their respective thresholds. The lead agency’s conclusion that operational air quality impacts are not significant is also inconsistent with the discussion in section 4.2 of Appendix C, which indicates that ROG (VOC) and NOx emissions from the proposed project exceed the relevant significance thresholds.